

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

DENISE SOBILO f/k/a IMAN SELEMAN,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 06 C 0461
	)	
HAMED SELEMAN, A. SAMI M. RAGEB,	)	
a/k/a SANI ROJEB, JOSEPH S. RAVAGO,	)	
MOHAMMED MAHMUTOVIC, individually	)	<b>JURY DEMAND</b>
and d/b/a ILLINOIS HEATING AND COOLING,	)	
CARMELO ROMAN, individually and d/b/a	)	
ROMAN ELECTRIC, and KAMAL IBRAHIM,	)	
individually and d/b/a FINAL TOUCH	)	
REMODELING SERVICE, INC.,	)	
	)	
Defendants.	)	

**PLAINTIFF'S SECOND MOTION FOR AN EXTENSION OF TIME TO  
EFFECT SERVICE ON  
KAMAL IBRAHIM AND HAMED SELEMAN**

Plaintiff Denise Sobilo by and through her attorneys for motion for an extension of time to effect service on Kamal Ibrahim and Hamed Seleman, states as follows:

1. Plaintiff filed the instant law suit on or about January 25, 2006.
2. Plaintiff retained the services of a private investigator to effect service on all defendants.
3. Service has been effected on A. Sami Rageb, Joseph Ravago, Carmelo Roman, and on Mohammed Mahmutovic.
4. Plaintiff has attempted service through a private investigator on Kamal Ibrahim and believed service was effected on Mr. Ibrahim at his residence.

5. However, plaintiff's counsel received a letter recently from a person claiming to be the former wife of Mr. Ibrahim who claims that she received the summons and complaint but Mr. Ibrahim no longer resides at the service address.

6. Plaintiff has subpoenaed the person who identified herself as the former spouse of Mr. Ibrahim to attempt to locate Mr. Ibrahim.

7. Plaintiff needs additional time to effect service on Mr. Ibrahim and will take the deposition of his former spouse in hopes that he can be located.

8. This court granted the prior motion of plaintiff for an extension of time to effect service until August 23, 2006 and plaintiff has been diligent in attempting to serve Mr. Ibrahim and Mr. Seleman.

9. Plaintiff has still been unable to attempt service on Mr. Seleman because his whereabouts in Egypt is unknown.

10. Plaintiff's counsel is in contact with counsel in Cairo, Egypt and is attempting to locate Mr. Seleman's whereabouts.

11. Federal Rule of Civil Procedure 4(m) provides in relevant part:

**(m) Time Limit for Service.** If service of the summons and complaint is not made upon a defendant within 120 days after the filing of the complaint, the court, upon motion or on its own initiative after notice to the plaintiff, shall dismiss the action without prejudice as to that defendant or direct that service be effected within a specified time; provided that if the plaintiff shows good cause for the failure, the court shall extend the time for service for an appropriate period. This subdivision does not apply to service in a foreign country pursuant to subdivision (f) or (j)(1).

10. Plaintiff is seeking an additional 90 days in which to locate and effect service on Kamal Ibrahim, and Hamed Seleman.

WHEREFORE Plaintiff Denise Sobilo respectfully requests that this Honorable

Court grant her an extension of time until November 21, 2006 to locate and effect service on Kamal Ibrahim, and Hamed Seleman. Plaintiff asks for such other and further relief as may be just and equitable.

Respectfully submitted,

DENISE SOBILO

\_\_\_\_/s/ Julie A. Boynton\_\_\_\_\_  
By: one of her attorneys

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